

MELINDA L. HAAG, CSBN 132612  
United States Attorney  
DONNA L. CALVERT, ISBN 6191786  
Regional Chief Counsel, Region IX  
Social Security Administration  
JACOB M. MIKOW, CSBN 238045  
Special Assistant United States Attorney  
Social Security Administration  
160 Spear St., Suite 800  
San Francisco, CA 94105  
Telephone: (415) 977-8976  
Facsimile: (415) 744-0134  
Email: Jacob.Mikow@ssa.gov

Attorneys for Defendant

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

JOSE VELASQUEZ,

Plaintiff,

vs.

CAROLYN W. COLVIN,  
Acting Commissioner of Social Security,

Defendant.

CIVIL NO. 3:14-CV-04361-MEJ

STIPULATION AND ~~PROPOSED~~  
ORDER FOR EXTENSION OF TIME  
FOR DEFENDANT TO FILE  
CROSS-MOTION FOR SUMMARY  
JUDGMENT AND OPPOSITION TO  
PLAINTIFF'S MOTION FOR  
SUMMARY JUDGMENT

IT IS HEREBY STIPULATED, by and between the parties, that Defendant shall have an extension of time of 30 days to file a Cross-Motion for Summary Judgment and Opposition to Plaintiff's Motion for Summary Judgment. This is Defendant's first request for an extension of time to respond to Plaintiff's motion. An extension of time is needed given Defense counsel's workload, and in order for counsel to review and respond to the issues raised in Plaintiff's motion.

The new due date for Defendant's Cross-Motion and Opposition will be May 8, 2015. The parties further stipulate that the Court's Scheduling Order shall be modified accordingly.

Stip. & Prop. Order for Extension, 3:14-CV-04361-MEJ

Respectfully submitted,

Dated: 4/6/2015

By: /s/ Rosemary Dady  
ROSEMARY DADY  
(as authorized via-email on 4/6/2015)

MELINDA L. HAAG  
United States Attorney

Dated: 4/6/2015

By: /s/ Jacob M. Mikow  
JACOB M. MIKOW  
Special Assistant United States Attorney  
Attorneys for Defendant

Of Counsel:

IN SEON JEONG  
Assistant Regional Counsel

ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: April 7, 2015



\_\_\_\_\_  
HON. MARI ELENA JAMES  
UNITED STATE DISTRICT JUDGE

Stip. & Prop. Order for Extension, 3:14-CV-04361-MEJ